

: CHAPTER 13

:
: BANKRUPTCY NO. 19-15200-eIf

IN OF CARRIE MARKO FOR RELIEF
STAY UNDER §362 OF THE BANKRUPTCY CODE

erke, by and through her attorney, Paul Brownstein,
represents the following:

Carrie Marko, the Wife of Joseph A. Marko, Joint
Debitors.
Joseph A. Marko, Husband of Carrie Marko, Joint

On 11/09/2019, Wife filed a divorce complaint in the Court
of Bucks County which was given the Docket No. 2015-

complaint, Wife requested equitable distribution.
In the marital residence, motor vehicles, retirement
accounts.

are the owners of the real estate located at 444
Hillside Drive, Trevose, PA 19053.

currently living at this residence and is responsible for
the mortgage payments.
On 11/09/2019, Husband and Wife filed the Bankruptcy

in the property which Wife desires to protect in the

us of moving the divorce and cannot do so because
of the stay in the divorce proceedings, 12/20/19

family Court in Bucks County.

want requests this Honorable Court to enter an Order

Stay to allow the further prosecution of the Divorce

mitted to, the disposition of the marital home and

Respectfully submitted:

A handwritten signature in blue ink, appearing to read "Paul Brownstein", is written over a horizontal line.

Paul Brownstein, Esquire
Attorney for Movant

Carrie Marko, Debtors

Joint Debtor with her husband, Joseph A. Marko,
an original and copy of our Motion for Relief from
our check no. 116 in the amount of \$181.00

and return a time stamped copy to us in the
stamped envelope.

to this request.